



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*86 Chambers Street
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May 2, 2025

Via ECF

The Honorable Katharine H. Parker
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States of America v. Anthem, Inc.*, No. 20 Civ. 2593 (ALC) (KHP)

Dear Judge Parker:

This Office represents the United States of America (the “Government”) in the above-referenced lawsuit. We write respectfully to request that the Court temporarily seal, until June 2, 2025, the reply memorandum of law in further support of the Government’s motion to compel Anthem to produce documents that it has withheld or redacted based on privilege, which the Government filed today (the “Government’s Reply”). The reason for this request is that the Government’s Reply includes quotations from documents designated by Anthem as Confidential pursuant to the operative protective order, ECF No. 96. Further, in light of the Court’s April 10, 2024, Order directing the parties to “make a specific showing that higher values justify” any redactions remaining under seal, we request that the redactions in the Government’s Reply be subject to the same procedure set forth in the Court’s Order, whereby a party may file a motion by June 2, 2025, requesting that the redacted information remain under seal after June 2, 2025. *See* ECF No. 199, at 4.

Lastly, the Government also respectfully requests permission to file on the docket a version of the Government’s Reply that redacts the information that Anthem had previously designated as Confidential, so that the Government’s Reply remains appropriately on the public docket (except for the redactions to the information designated as Confidential) in the interim. Anthem consents to the Government’s requests.

We thank the Court for its consideration of these requests and attention to this matter.

Respectfully submitted,

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cc: Anthem's Counsel (via ECF)